

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

**INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS DAVID E. WILLIAMS
(APWU/USPS-T1-31-38)
(February 23, 2012)**

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness David E. Williams (USPS-T-1). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

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APWU/USPS-T1-31 As explained in your testimony, significant changes to FCM service standards will occur, particularly overnight/next day delivery will move to 2 days and a large portion of 2-day will move to 3-day. How will these changes in service standards specifically affect the FCM sub-category of FCM parcels?

APWU/USPS-T1-32 Page 25 of your testimony indicates that no changes will occur to service standards for Standard Mail and Package Services. Does this mean that the parcel subcategories of mail within Standard Mail and Package Services will also experience no change in service standards?

APWU/USPS-T1-33 Page 25 of your testimony also states that no service standard changes for Standard Mail and Package Services will occur “except for 3-digit zip to 3-digit zip changes based on reconfiguration of the network.” Please identify the changes that will occur due to reconfiguration of the network.

- a) Will these changes specifically affect the parcel sub-categories in both of these classes of mail products?
- b) What percentage of total mail volume and specifically each parcel subcategory will have a service standard change due to reconfiguration of the network?
- c) How are these changes to the service standards of standard mail parcels and package mail parcels different from the changes in service standards for periodicals?

APWU/USPS-T1-34 Page 26 of your testimony states that “[t]he Postal Service will continue to provide a 1-3 day Priority Mail service after network consolidation is implemented,” and that it will also “continue to provide overnight Express Mail service.” Your testimony further states that for both Priority Mail and Express Mail, “[t]he standards from each origin zone to the remainder of the country will be defined by the capability of the realigned mail processing network.”

- a) What will be the impact of the realigned network on the service standards of these competitive products?
 - i. What percentage of Express Mail volume is currently delivered in one day? How will this change under the realigned network?
 - ii. What percentage of Priority Mail volume is currently delivered in one day? In two days? In 3 days? In more than three days? What will these figures be under the realigned network?
- b) What is the anticipated impact on the parcel components of these competitive products?
 - i. What percentage of Express Mail parcel volume is currently delivered in one day? How will this change under the realigned network?

- ii. What percentage of Priority Mail parcel volume is currently delivered in one day? In two days? In 3 days? In more than three days? What will these figures be under the realigned network?
- c) What percentage of Priority Mail and Express Mail respectively, will experience a downgrade in actual service time due to the network realignment?
- d) Will Priority Mail and Express Mail require product specific transportation after network realignment?

APWU/USPS-T1-35 Given that mail processing facilities will be closed as a result of this current proposal, there will be increased distances and longer transit times among plants. Based on these farther distances and longer transit times, what will be the changes to CET times and processing schedules due to the plant realignment changes?

- a) How much will costs increase if the current CET times and Clearance Times (CT) are maintained just for Priority Mail and Express Mail products?
- b) How will this affect service standards?

APWU/USPS-T1-36 Please confirm that the AMP study process has no accounting for the following “frictional” or transactions costs:

- Out of schedule premium. For example, in Daytona over a \$.5million was spent on out of schedule premium for employees on temporary detail as a result of transitioning;
- Travel time, Mileage Per Diem and transportation costs. For example in Daytona the USPS is paying temporarily detailed employees for their travel time, transportation costs and mileage.
- Transportation of employees from one facility to another. For example in Ashland, KY, the Postal Service is providing buses and vans to transport employees on temporary detail to the gaining facility in Charleston, WV from Ashland. Relocation Benefits;
- New Training costs, other than maintenance; and
- Saved grade costs. For example in Daytona, you had 20 employees who received a saved grade.

APWU/USPS-T1-37 Please confirm that the PIR process counts as savings from the AMP the workhour savings resulting from the loss of mail volume over the time of the original AMP and PIR.

- a) Please also confirm that the PIRs include the savings resulting from concurrent initiatives workhour savings that are unrelated to the AMP, such as the Early Retirement program.

APWU/USPS-T1-38 Confirm that Charleston, WV received 3 machines from Ashland, KY and 4 additional machines from other locations.

- a) Please confirm that the AMP shows that Ashland, KY saved \$44,758.00 as a result of moving the three machines to Charleston, WV, while there is no increase in Part, Supplies, and Facility Utilities listed for Charleston, WV despite its gaining the 3 Ashland machines and 4 others.
- b) What instructions are given to the field to account for changes in Part, Supplies and Facility Utilities as a result of an AMP.